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Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of)

JUL 14 1998

1998 Biennial Regulatory Review --)
Streamlining of Radio Technical Rules in)
Parts 73 and 74 of the Commission's Rules)

MM Docket No. 98-93

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**NATIONAL ASSOCIATION OF BROADCASTERS
MOTION FOR EXTENSION OF TIME OF COMMENT
AND REPLY COMMENT DEADLINES**

Pursuant to 47 C.F.R. § 1.46, the National Association of Broadcasters ("NAB")¹ requests the Commission to extend the comment and reply comment deadlines in the above-captioned proceeding by sixty (60) days each. In this proceeding the Commission has asked for public comment on several dramatic proposals to streamline and otherwise revise key FM technical rules. The issues embodied in the proposal are important to the Commission, to the broadcasters that NAB serves and to the public served by broadcasters.

The Commission's *Notice of Proposed Rule Making* ("Notice")² was published in the Federal Register on June 22, 1998. Thus, the comment and reply comment deadline dates are set at August 21, 1998, and September 21, 1998, respectively.³ For the reasons stated below, NAB

¹ NAB is a nonprofit, incorporated association of television and radio stations and broadcast networks which serves and represents the American broadcast industry.

² In the Matter of 1998 Biennial Regulatory Review -- Streamlining of Radio Technical Rules in Parts 73 and 74 of the Commission's Rules, MM Docket No. 98-93 ("Notice"), released June 15, 1998.

³ 63 Fed. Reg. 33892 (1998).

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believes there is good cause for the FCC to provide a brief extension in these deadlines. Such an extension will provide time for NAB and allied parties to engage in thorough evaluation of these proposals and to prepare comments founded on the results of these analyses. Thus, we recommend the adoption of revised comment and reply comment dates of October 20, 1998, and November 20, 1998, respectively.

The *Notice* proposes vast changes to current FCC policies and rules regarding FM technical rules. There has not been such a sweeping set of proposals for FM technical change⁴ since the Commission proposed and adopted what has now become known as "Docket 80-90."⁵ Indeed, in many respects the Commission's current *Notice* proposes changes even more dramatic than those adopted 15 years ago in the MM Docket No. 80-90 proceeding.

Among other activities undertaken with regard to the *Notice*, NAB has formed an ad hoc committee of broadcast engineers to study the proposals advanced in the *Notice*. This group will hold its initial meeting here at NAB on July 15, 1998. Other meetings and intense work by this committee and others are contemplated for occurring over the summer.

Clearly, this group needs time to meet, discuss and form conclusions regarding the potential impact of the proposals set forth by the Commission. A brief extension of the comment and reply comment dates, we believe, will afford this group and other broadcasters the time needed to engage in these essential technical and analyses and to afford NAB and radio broadcasters to participate more meaningfully in this proceeding. Such participation will afford

⁴ The FCC also proposes to make several rule changes that would affect AM broadcasting as well.

⁵ *Modification of FM Broadcast Station Rules to Increase the Availability of Commercial FM Broadcast Assignments*, 94 FCC 2d 152 (June 14, 1983).

a more comprehensive record upon which the FCC can base its ultimate decision in this rulemaking proceeding.


Respectfully submitted,

**NATIONAL ASSOCIATION
OF BROADCASTERS**

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